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9 Attorneys for United States of America

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13 UNITED STATES OF AMERICA,)	Case No.: CR 17-00165 JST
14 Plaintiff,)	
15 v.)	STIPULATION AND PROPOSED ORDER
16 JABARI GAMBA MACKEY,)	EXCLUDING TIME FROM APRIL 28, 2017 TO
17 Defendant.)	JUNE 16, 2017
)	

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20 On April 28, 2017, the defendant, Jabari Gamba Mackey, represented by John Paul Reichmuth,
21 Assistant Federal Public Defender, and the government, represented by Michelle Bazu, Assistant United
22 States Attorney, appeared before the Honorable Jon S. Tigar for a status hearing. The matter was
23 continued to June 16, 2017, at 9:30 a.m. to set further proceedings.

24 The parties agree to exclude the time between April 28, 2017 and June 16, 2017 from the time in
25 which the defendant must be brought to trial pursuant to the Speedy Trial Act, 18 U.S.C. § 3131 *et al.*
26 The government has produced discovery, including multiple CDs, on April 17, 2017. Defense counsel
27 continues to review the discovery, conduct further investigation and research, and will need additional
28 time to discuss the discovery and the case with the defendant. Therefore, the parties agree that the time

1 period of April 28, 2017 and June 16, 2017, inclusive, should be excluded pursuant to 18 U.S.C. §§
2 3161(h)(7)(A) and (h)(7)(B)(iv) on the basis that the ends of justice served by the continuance outweigh
3 the best interests of the public and defendant in a speedy trial, and failing to exclude this time would
4 deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of
5 due diligence.

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7 DATED: April 28, 2017


8 /s/
John Paul Reichmuth
Counsel for Jabari Gamba Mackey

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10 DATED: April 28, 2017

11 /s/
MICHELLE BAZU
Assistant United States Attorney

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DATED: May 1, 2017


HONORABLE JON S. TIGAR
United States District Judge